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*Attorneys for Defendants City of
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION

TAMARA DOWNEN, Individually
and as Personal Representative for the
ESTATE OF STANLEY L.
DOWNEN,

Plaintiffs,

v.

MONTANA VETERANS' HOME;
STATE OF MONTANA
DEPARTMENT OF PUBLIC
HEALTH AND HUMAN SERVICES;
CITY OF COLUMBIA FALLS; MIKE
JOHNSON and DAVID G. PERRY,

Defendants.

Cause No. CV-13-121-M-DWM

**AFFIDAVIT OF WILLIAM L.
CROWLEY CONCERNING
MOTION *IN LIMINE* AS TO
PLAINTIFF'S EXPERTS**

STATE OF MONTANA)
: ss.
County of Missoula)

William L. Crowley, being first duly sworn upon his oath, deposes and says
as follows:

1. William L. Crowley is one of the attorneys representing Defendants
City of Columbia Falls, Mike Johnson and David G. Perry in the above action.
2. Attached as Exhibit A is the unsworn declaration of Mark Kroll,
Ph.D., FACC, FHRN, under 28 U.S.C. § 1746. The unsworn declaration provides
the medical and scientific bases for excluding the testimony of Dr. Walter Peschel
under *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), and
Rule 702, Fed. R. Evid.

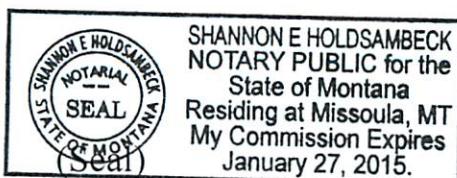
DATED this 8th day of January, 2014.


William L. Crowley

BOONE KARLBERG P.C.

Attorneys for Defendants City of
Columbia Falls, Mike Johnson and
David G. Perry

SUBSCRIBED AND SWORN TO before me this 8th day of January, 2014,
by William L. Crowley.




Shannon E. Holdsambeck
Notary Public for the State of Montana
Residing at: Missoula, Montana
My Commission Expires: January 27, 2015